

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

Gilbert *et al.*,

Civil No. 1:25-cv-00421-DDD-
JPM

Plaintiffs

VS.

Judge Drell

Harris County *et al.*,

Magistrate Judge
Perez-Montes

Defendants

PROPOSED PLAN OF WORK

On, the following individuals participated in a meeting X by video conference call on May 30, 2025 during which this Plan of Work was formulated: Stephen Weil, Romanucci & Blandin LLC (Plaintiffs); Deirdre C. McGlinchey, McGlinchey & Stafford PLLC (LaSalle defendants); Brandon B. Brown McGlinchey & Stafford PLLC (LaSalle defendants) Seth Hopkins and Gregory Burnett, Harris County Attorney's Office (Harris County Defendants).

Part A

Based on the information now reasonably available, the parties have agreed upon the following:

1. 9/14/26 Deadline for completion of discovery
2. 10/14/26 Final date for filing dispositive motions
3. 10/1/25 Final date for adding parties
4. 10/1/25 Final date for filing amended pleadings
5. 4/1/26 Final date for plaintiffs employing and disclosing experts
6. 5/1/26 Final date for defendants employing and disclosing experts
7. 6/1/26 Plaintiffs' reports of experts due
8. 7/1/26 Defendants' reports of experts due
9. 7/15/26 Plaintiffs' rebuttal of experts reports
10. _____
11. 9/14/26 Final date for taking depositions of experts

12. _____ Date disclosures under Fed. R. Civ. P. 26(a) were made or will
7/1/25 be made

13. Considering the subjects addressed by Fed. R. Civ. P. 26(f), the parties propose the following changes, limitations, or other matters: NONE

Part B

The following areas of disagreement, issues, or problems have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process: NONE.

6/10/2025

(Date)

/s/ Seth Hopkins

(Signature)

Seth Hopkins

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6/10/2025

(Date)

/s/ Gregory Burnett

(Signature)

Gregory Burnett

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6/10/2025

(Date)

/s/ Deirdre C. McGlinchey

(Signature)

Deirdre c. McGlinchey (24167) (T.A.)**dmcglinchey@mcglinchey.com****Brandon B. Brown (31068)****bbbrown@mcglinchey.com****Courtney T. Joiner (32878)****ctjoiner@mcglinchey.com****Robert K. Denny (33092)****rdenny@mcglinchey.com****Gillian M. McCarroll (40452)****[gmccarroll@mcglinchey.com](mailto:gmc Carroll@mcglinchey.com)****Ryan G. Lavelle (41305)****rlavelle@mcglinchey.com****McGLINCHEY STAFFORD, PLLC****601 Poydras Street, Suite 1200****New Orleans, Louisiana 70130****Telephone (504) 586-1200****Facsimile (504) 596-2800***Attorneys for Lasalle Correctional Center,**L.L.C., Lasalle Corrections, L.L.C., Lasalle**Management Company, L.L.C., Clay**McConnell, William McConnell, John**Stuckey, Paul Smith, Richard Morehead,**Mariah Dickey, Pamela Hearn, Charlotte**Fussell, Shannon Brewer, Gwen Warren, and**Denise Finlay*

6/10/2025

(Date)

/s/ Stephen Weil

(Signature)

Stephen Weil**Romanucci and Blandin, LLC****Antonio Romanucci (*pro hac vice*)****Stephen Weil (*pro hac vice*)****Sam Harton (*pro hac vice*)****321 N. Clark St.****Chicago, IL 60654****Tel: (312) 458-1000**

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ORDER

Considering the Proposed Plan of Work submitted herein,

IT IS ORDERED that the Plan of Work be and is hereby accepted and shall become the Scheduling Order in this case, subject to the following modifications:

It appearing to the Court that the provisions of the Plan of Work will be satisfied on ____, 20__,

IT IS FURTHER ORDERED that a pretrial conference be held, in Chambers, on ____, 20__, beginning at __:__ .M.

IT IS FURTHER ORDERED that the Clerk of court send out the Civil Case Management Order No. 2 – Pretrial Proceedings.

IT IS FURTHER ORDERED that counsel are to review this Court's Standing Order – Possession and Use of Electronic Devices in the Courtroom found on our website at www.lawd.uscourts.gov on Judge Dee D. Drell's forms page.

SIGNED on this ____ day of ____, 20__, at Alexandria, Louisiana.

DEE D. DRELL, JUDGE

UNITED STATES DISTRICT COURT